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April 12, 2018

VIA ECF

Hon. P. Kevin Castel  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *In re SunEdison, Inc. Sec. Litig.*, No. 16-md-02742-PKC  
(Case Nos. 1:16-cv-08006-PKC (“*Cobalt*”); 1:16-cv-08032-PKC (“*Glenview*”);  
1:16-cv-07428-PKC (“*Omega*”); and 1:16-cv-08204-PKC (“*VMT II*”))

Dear Judge Castel:

We represent the plaintiffs in the four individual actions referenced above. On Tuesday, April 10, 2018 we filed a Consolidated and Amended Complaint (“Complaint”) in each action pursuant to the Court’s endorsement of our letter request to do so. ECF No. 310. The ECF system would not permit us to file an amended complaint in the MDL because there is no original complaint for those actions to which an amended pleading can be linked. After several unsuccessful attempts to file in the MDL, we attempted to and were successful in filing the complaints in each of the individual actions in order to meet the filing deadline.<sup>1</sup>

We immediately contacted the Clerk’s office to explain the problem and seek instructions as to how to also file the amendment in the MDL. After investigating the issue, the Clerk’s office advised us yesterday that they did not have a solution to the problem and that your chambers had requested that we send this letter to: (i) inform the Court that the amended complaint had been filed in the four individual actions per the endorsement memo (ECF No. 310); and (ii) explain the filing problems and request direction from the Court as to whether it is necessary to file the Complaint in

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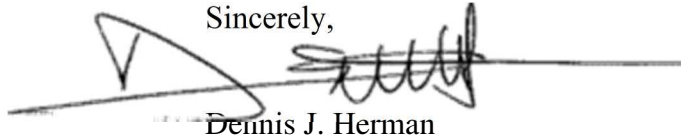
<sup>1</sup> Pursuant to the Court’s grant of our request to file a single consolidated complaint in all four actions (ECF No. 310), the April 10 filing identified all four actions in the caption. On April 11 we received notices of deficiency in the three actions which were not identified on the first page of the caption. We therefore refiled the complaints yesterday with revised captions in each of those actions. *See VMT II*, ECF No. 58; *Glenview*, ECF No. 192; *Cobalt*, ECF No. 186.

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the MDL action itself and, if so, to request that the Court provide direction to the Clerk and to us as to how to proceed to do so.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis J. Herman", with a long horizontal line extending to the right.

Dennis J. Herman

cc: All Counsel of Record (via ECF)